

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

(1) MARK RAYMOND,

Plaintiff,

v.

Case No. 20-cv-00122-JFH-CDL

(1) AMERICAN MERCURY INSURANCE
COMPANY,

Defendant.

JOINT MOTION TO EXTEND SCHEDULING ORDER DEADLINES

COME NOW the parties jointly, by and through their attorneys of record, and respectfully request an Order of this Court extending all pending deadlines an additional one hundred and twenty (120) days. In support of this Motion, the Parties would show this Court as follows:

1. Plaintiff filed this action on March 25, 2020. *See* Dkt. No. 2.
2. Defendant filed a Motion to Dismiss on April 28, 2020. *See* Dkt. No. 7.
3. On December 19, 2022, the Court denied Defendant's *Motion to Dismiss*. *See* Dkt. No. 48.
4. On January 30, 2023, Defendant changed counsel and new counsel entered their appearance in this case. *See* Dkt. Nos. 59 and 60.
5. On February 15, 2023, the parties filed a joint status report. *See* Dkt. No. 66.
6. On February 16, 2023, the Court entered a Scheduling Order setting an expert deadline of July 5, 2023.

7. The parties are still engaged in discovery. On June 5, Defendant provided substantive responses Plaintiff's discovery requests. However, before the parties identify and exchange experts, the parties need to complete additional written discovery and take fact witness depositions.

8. The Parties anticipate scheduling depositions by agreement but, in light of the parties' counsels' respective schedules, do not believe that the necessary depositions can be completed prior to the current deadline to exchange expert disclosures.

9. In light of the respective upcoming schedules of the Parties, their counsel and the witnesses, the Parties believe an extension of one hundred and twenty (120) days is necessary and sufficient to allow complete discovery and depositions in advance of trial.

10. The granting of this Application will extend all deadlines by one hundred and twenty (120) days.

11. This Application is not made for purposes of delay, but it is made in good faith in order to allow the parties sufficient time to complete the necessary discovery to prepare the case for resolution or trial.

12. For the Court's convenience, a proposed order is being submitted herewith.

AGREED BY:

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